

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,

Plaintiff,

v.

- [1] JUAN CARLOS ORTIZ-VAZQUEZ,
aka "FLACO,"
(Counts 1-8)
- [2] CRISTINA GUEVARA-CASELLAS,
(Counts 1-8)
- [3] ELIAS MARTINEZ-RIVERA,
aka "VIEJO-COLI,"
(Count 1)
- [4] JOSE LUIS AUDAIN-
RODRIGUEZ,
aka "WICHY, NEGRE, DOBLE V-
W, DOBLETA,"
(Count 1)
- [5] CHRISTOPHER SANCHEZ-
ASENCIO,
aka "GUAYNA,"
(Count 1)
- [6] MOISES MOJICA-TORRES,
aka "MOI,"
(Counts 1 and 2)
- [7] ERNESTO MALAVE-SANTIAGO,
aka "PONCE,"
(Counts 1, 2, and 9)
- [8] STEVE VERGELI-NEGRON,
aka "BOCILLO,"
(Count 1)
- [9] JIM ALMODOVAR-
QUIRINDONGO,
aka "JIM BALL,"
(Count 1)

CRIMINAL NO. 24-456(SCC)

[10] ANGEL ABDIEL ARCHILLA-MONTALVO,
(Count 1)

[11] EFRAIN GONZALEZ-SERRANO,
aka “EL SENOR DE LOS CIELOS, JUNITO,”
(Count 1)

[12] ERNESTO VARGAS-RODRIGUEZ,
aka “GOLO,”
(Count 1)

[13] EDDIBER PEREZ-BURGOS,
aka “COAMO,”
(Count 1)

[14] ABRAHAM RODRIGUEZ-CRUZ,
aka “BEBE,”
(Count 1)

[15] ALEXANDER ALVARADO-ALMESTICA,
aka “BALA,”
(Count 1)

[16] JENSEN MEDINA CARDONA,
(Count 1)

[17] EDGARDO SANTIAGO-COLON,
aka “CUCO,”
(Count 1)

[18] EDWIN SANCHEZ-RIJOS,
aka “TOCAYO,”
(Count 1)

[19] FELIX SERRANO-ROMAN,
aka “COBA,”
(Count 1)

[20] HARRY ACEVEDO-MENDEZ,
aka “LA H,”
(Count 1)

[21] HERIBERTO ROMERO-CORCHADO,
aka “ERI,”
(Count 1)

[22] JAMES SANTANA-GONZALEZ,
aka "PILIN,"
(Count 1)

[23] JULIO VARGAS-JIMENEZ,
aka "JULIO GATILLO,"
(Count 1)

[24] KERVIN LOPEZ-TORRES,
aka "BEETHOVEN, GORDO,
GEMELO,"
(Count 1)

[25] KEVIN HERNANDEZ-RUIZ,
aka "PESADILLA,"
(Count 1)

[26] MIGUEL GONZALEZ-
CONCEPCION,
aka "OMY BARBER, OMY
GALLINA,"
(Count 1)

[27] LUIS MELENDEZ-GARCIA,
aka "LUISITO HUMACAO,"
(Count 1)

[28] ANIBAL RAMIREZ-ALICEA,
aka "NIBBY, ANIBAL MARTINEZ-
ALICEA,"
(Count 1)

[29] BENNY RODRIGUEZ-MERCADO,
(Count 1)

[30] CHRISTIAN CANDELARIA-
FELICIANO,
aka "GARBANZO,"
(Count 1)

[31] DONATO CORTES-MATOS,
(Count 1)

[32] WESLEY CORREA-LOPEZ,
(Count 1)

[33] MILAGROS JEANETTE RIVERA-
GONZALEZ,
aka "JANET,"
(Count 1)

[34] MINERVA ROMAN-
DOMINGUEZ,
(Count 1)

Defendants.

**THE UNITED STATES' INFORMATIVE MOTION REGARDING
THE COUNTS AND PENALTIES OF THE INDICTMENT**

TO THE HONORABLE COURT:

COME NOW the United States of America, represented by the undersigned attorneys, and respectfully provides the Court with information regarding the Indictment filed at Docket Entry No. 3 in terms of the counts charged and the maximum penalties for the defendants charged in the case. The United States shows as follows:

1. COUNT ONE of the Indictment charges defendants [1] through [34] with Controlled Substance Conspiracy in violation of Title 21, United States Code, Sections, 841(a)(1), (b)(1)(A), (b)(1)(B) and 846.
 - a. In regard to Count One, the maximum penalty for the offense charged is a term of imprisonment of at least ten (10) years, but not more than life; a fine not to exceed the greater of that authorized in accordance with the provisions of Title 18, United States Code, 3571(b) or ten million dollars (\$10,000,000.00); and

a supervised release term of at least five (5) years, all pursuant, to 21 U.S.C. § 841(b)(1)(A)(i) and (b)(1)(A)(vi).

2. COUNT TWO charges defendants [1] Juan Carlos Ortiz-Vazquez aka “Flaco,” [2] Cristina Guevara-Casellas, [6] Moises Mojica-Torres aka “Moi,” and [7] Ernesto Malave-Santiago aka “Ponce” with Aiding and Abetting in the Distribution of Controlled Substances Resulting in Death, in violation Title 21, United States Code, Section, 841(b)(1)(A).

a. In regard to Count Two, the maximum penalty for the offense charged for defendants [1] Juan Carlos Ortiz-Vazquez aka “Flaco,” [2] Cristina Guevara-Casellas, [6] Moises Mojica-Torres aka “Moi” and [7] Ernesto Malave-Santiago aka “Ponce” is a term of imprisonment that is not less than 20 years or more than life, a fine not to exceed the greater of that authorized in accordance with the provisions of Title 18, United States Code, 3571(b) or 10 million dollars (\$10,000,000.00); and a supervised release term of at least five years, all pursuant, to 21 U.S.C. § 841(b)(1)(A)(i) and (b)(1)(A)(vi).

3. COUNT THREE through COUNT FIVE charge defendants [1] Juan Carlos Ortiz-Vazquez aka “Flaco” and [2] Cristina Guevara-Casellas with

Aiding and Abetting in the Distribution of Controlled Substances Resulting in Death, in violation Title 21, United States Code, Sections, 841(b)(1)(A).

a. In regard to Count Three through Count Five for defendant [1] Juan Carlos Ortiz-Vazquez aka “Flaco” and defendant [2] Cristina Guevara-Casellas, the maximum penalty for the offense charged is a term of imprisonment that is not less than twenty (20) years, but not more than life; a fine not to exceed the greater of that authorized in accordance with the provisions of Title 18, United States Code, 3571(b) or ten million dollars (\$10,000,000.00); and a supervised release term of at least five (5) years, all pursuant, to 21 U.S.C. 841(b)(1)(A)(i) and (b)(1)(A)(vi).

4. COUNT SIX through COUNT EIGHT charge defendants [1]

Juan Carlos Ortiz-Vazquez aka “Flaco” and [2] Cristina Guevara-Casellas with Money Laundering (Engaging in Monetary Transactions in Property Derived from Specified Unlawful Activity-Aiding and Abetting-) in violation of Title 18, United States Code, Section 1957.

a. In regard to Count Six through Count Eight, the maximum penalty for the offense charged is a fine under title 18, United States Code, or imprisonment for not more than ten years or both,

and a supervised release term of not more than three years, pursuant to 18 U.S.C. § 3583(b)(2).

5. COUNT NINE charges defendant Ernesto Malave-Santiago aka “Ponce” with Possession of a Firearm in Furtherance of a Drug Trafficking Crime in violation of Title 18 United States Code, Sections 924(c)(1)(A)(i), and 2.

a. In regard to Count Nine, the penalty for the offense charged is a term of imprisonment of not less than five (5) years and up to life imprisonment, to be served consecutive from any other count of conviction; a fine not to exceed \$250,000.00; and a term of supervised release up to five (5) years pursuant to Title 18, United States Code, Section 924(c)(1)(A).

WHEREFORE, the United States respectfully provides the Court with information regarding the Indictment filed at Docket Entry No. 3.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 16th December of 2024.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all parties.